



201-15467

Product Safety and Regulatory Affairs

July 1, 2004

Mike Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Re: HPV Chemical Challenge Program

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Dear Mr. Leavitt:

Crompton Corporation would like to commit to additional chemicals in the HPV Chemical Challenge Program. Crompton acquired interest in the chemicals listed below on July 31, 2003 from GE Specialty Chemicals:

CAS Number	Chemical Name	Start Year
144354	2,4,8,10-tetraoxa-3,9-diphosphaspiro[5.5]undecane, 3,9-diphenoxy-	2000
3806346	2,4,8,10-tetraoxa-3,9-diphosphaspiro[5.5]undecane, 3,9-bis(octadecyloxy)-	2003
26471537	2,4,8,10-tetraoxa-3,9-diphosphaspiro[5.5]undecane, 3,9-bis[2,4-bis(1,1-dimethylethyl)phenoxy]-	2002
116265-68-0	Phosphorous acid, triphenyl ester, reaction product with dipropylene glycol	2004

Through this letter, we are informing you that Crompton Corporation will commit to the sponsorship of these chemicals in the HPV Challenge Program as an individual company.

Crompton's commitment for the remaining CAS Nos. listed in our 30 November 1999 and 22 December 1999 letters to you remains intact.

Should you have any questions please do not hesitate to contact me directly at (203) 573-2219. My fax number is (203) 573-4531.

Sincerely yours,

Alan Taylor, D.
Director, Product Safety and Regulatory Affairs
Crompton Corporation

cc: Barbara Leczynski, USEPA
Jim Keith, ACC Product Stewardship Team



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A Public Commitment